

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Petition For Rulemaking Number 9246
Amendment of Part 73 of the Rules to
Establish Event Broadcasting Stations

COMMENTS DUE BY APRIL 27, 1998

COMMENTS OF AMERICAN COMMUNITY AM
BROADCASTERS ASSOCIATION, INC.

AMERICAN COMMUNITY AM BROADCASTERS ASSOCIATION, INC.,
formed in March 1997 as this country's only exclusive
broadcasters association representing FCC licensed AM
broadcast stations with approximately 200 member stations
come before the Honorable Federal Communications Commission
with our comments to the above described Petition For Rule
Making and state as follows:

1. Web SportsNet, Inc., has submitted a very interest-
ing proposal for rule changes to accomodate what they call
"event broadcasting". The American Community AM Broadcast-
ers (herein after refered to as ACAMBA) do not feel the
creation and or establishment of such a new service is
justified or needed for several reasons:

2. the problems associated with control and clearance
and assignment of a "event channel" frequency. We note
where Web SportsNet has volunteered to serve as the national
"coordinator" for this, however, we feel placing this
and control in the hands of a private company or individual,
especially the party proposing the amendment to the rules,
is not in the best interest of the public,

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3. Existing commerical AM and FM radio have a long and reputable history in providing "event" broadcasting of the type and variety described by the applicant in its petition. Existing commerical AM and FM stations are commonly known to provide "event broadcasting" at county fairs, car races, boat races, horse races, high school sports, college sports, professional sports, tennis games, track and marathons, and the list continues. Creation of "event broadcasting" is nothing more than a means for someone who is not a fulltime broadcaster who is providing the community with local news, public service announcements, emergency weather reports and other vital services at, in most instances, a very substantial investment, the opportunity to come in their community from any part of the country, and compete against them. The event broadcaster if permitted, will be able to set up a station and go on the air and conduct the broadcast at a rate much less than the established broadcasters. This is not fair to the established broadcast stations.

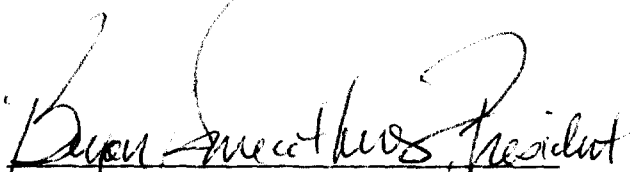
4. The proposal for creating "event" broadcasting is too vague and lacks proper control. There are no restrictions as to the amount of time such a station could operate. There must be a specified time limit as to the total amount of time it may operate. For example, here in Kentucky there are several thorobred horse tracks at which

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area commercial stations broadcast the races on a daily basis during the summer racing season. Under the Web Sports Net petition, this event would qualify for a event broadcasting station. If event broadcasting stations were allowed under the FCC rules and these horse tracks in Kentucky applied and received such authority to operate "event" stations they would in essence be operating a radio station for approximately 10 hours a day for roughly six months out of the year and at the same time creating potential harm to local commercial radio stations, not to mention the potential loss of revenue to the stations previously providing this service. And yes, the race track in all probability select to operate its own "event" broadcast station "in-house" to save money. This same situation could likely arise at the local car race track, county fair and so on.

5. It would not be in the best interests of the public or existing and future AM and FM commercial radio stations to allow the creation or means of such a low cost means to compete against them, considering the vast investments made in the commerical stations. Furthermore, event broadcasting stations would not be able to provide EAS announcements.

WHEREFORE, Respondent requests that the Proposed Rule making be dismissed and that creation of "event broadcasting" stations be prohibited.


Bryan Smeathers, President

Respectfully submitted,

AMERICAN COMMUNITY AM
BROADCASTERS, INC.

POB 973, Central City, KY